

APR 17 2002

PULPDENT CORPORATION

510 k Premarket Notification  
Pulpdent Post Cement

1K020481

EXHIBIT 2

SUMMARY OF SAFETY AND EFFECTIVENESS DATA

Kenneth J. Berk  
80 Oakland Street  
PO Box 780  
Watertown, MA 02472 USA

Telephone: 617-926-6666  
Fax: 617-926-6262  
[ken@pulpdent.com](mailto:ken@pulpdent.com)

DEVICE:

Trade Name: **PULPDENT POST CEMENT**

Classification Name: Dental Cement

FDA Product Code: 76 EMA, 21 CFR Part 872.3275

PREDICATE DEVICE:

Pulpdent ResiLute  
Kuraray / J. Morita Panavia F  
ESPE Compolute Aplicap  
Ivoclar / Vivadent Variolink II

DESCRIPTION AND INTENDED USE:

**PULPDENT POST CEMENT** is a fluoride releasing, dual cure dental resin cement that contains no Bisphenol A. It is used to permanently cement dental posts, porcelain crowns, inlays, onlays, bridges, veneers and periodontal splints to tooth structure. Pulpdent Post Cement is also used for bonded amalgam techniques.

COMPARISON WITH PREDICATE PRODUCTS:

**PULPDENT POST CEMENT** is substantially equivalent in design, composition, performance, intended use, safety and effectiveness to the predicate products listed above.

SAFETY AND EFFECTIVENESS:

**PULPDENT POST CEMENT** is substantially equivalent in design, composition, performance, intended use, safety and effectiveness to the predicate products listed above. The predicate products have been found substantially equivalent under the 510(k) premarket notification process as Class II Dental Devices under CFR 872.3275.

According to the NIH Technology Assessment Conference on *Effects and Side-Effects of Dental Restorative Materials*: "General usage of these materials over about 20 years indicates a high benefit-to-risk ratio...both composites and glass ionomers are relatively trouble-free. There is no evidence of short-term or long-term risk...There is no suspicion of any problems after virtually billions of procedures in the United States.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

Mr. Kenneth J. Berk  
Director  
Pulpdent Corporation  
80 Oakland Street  
Watertown, Massachusetts 02472

**APR 17 2002**

Re: K020481  
Trade/Device Name: Pulpdent Post Cement  
Regulation Number: 872.3275(b)  
Regulation Name: Dental Cement  
Regulatory Class: II  
Product Code: EMA  
Dated: February 08, 2002  
Received: February 13, 2002

Dear Mr. Berk:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

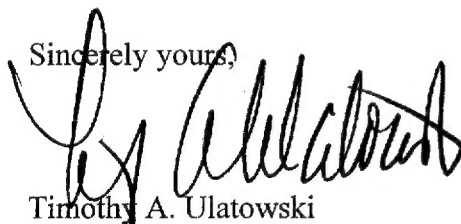
Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 21 CFR Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4613. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,



Timothy A. Ulatowski

Director

Division of Dental, Infection Control,  
and General Hospital Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

# INDICATIONS FOR USE STATEMENT

510 (k) Number K020981  
(if known)

Device Name **PULPDENT POST CEMENT**

## Indications for Use:

*Pulpdent Post Cement* is a fluoride releasing, dual cure dental resin cement that contains no Bisphenol A. It is used to permanently cement dental posts, porcelain crowns, inlays, onlays, bridges, veneers, and periodontal splints to tooth structure. Pulpdent Post Cement is also used for bonded amalgam techniques.

*Please do not write below this line. Continue on another page if needed.*

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use ☒  
(Per 21 CFR 801.109)

or

Over-The-Counter Use

Sueen Runge  
(Division Sign-Off)  
Division of Dental, Infection Control,  
and General Hospital Devices  
510(k) Number K020981